

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOE,)	
)	Case No: 7:21-CV-03193-DCC
Plaintiff,)	
)	
vs.)	LIMESTONE UNIVERSITY f/k/a
)	LIMESTONE COLLEGE, SHARON
LIMESTONE UNIVERSITY F/K/A)	HAMMONDS, and BRENDA
LIMESTONE COLLEGE, COLLINS)	WATKINS' CERTIFICATE OF
MURPHY, MG FREESITES, LTD., d/b/a)	SERVICE OF EXPERT REPORT
PORNHUB.COM and HAMMY MEDIA)	
LTD. d/b/a XHAMSTER.COM,)	
)	
Defendants.)	

Defendants **Limestone University, Sharon Hammonds, and Brenda F. Watkins,**
Defendants in the above-styled civil action, disclose the following expert witness under Rule
26(a)(2) and certifies that written reports prepared and signed by its expert witness has been served
upon the other parties.

The above-referenced Defendants disclose the following expert:

Dr. Steve Albrecht, SHRM PHR, ASIS CPP, ATAP CTM
901 E. Saint Louis Street, Suite 107
Springfield, MO 65806

Dr. Albrecht is a security consultant and workplace violence prevention trainer as well as a Human Resources consultant and trainer. He is expected to testify regarding the reasonableness of Defendants' hiring and supervision of Collins Murphy, as well as address the substance of Plaintiffs' identified experts' opinions. Dr. Albrecht's opinions are more fully contained in the written report served upon the other parties pursuant to Rule 26(a)(2)(B).

This 18th day of March, 2024.

{SIGNATURE PAGE TO FOLLOW}

RAHIMI, HUGHES & PADGETT, LLC

/s/ JOSEPH Y. RAHIMI II

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